

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANDREW CHANG and RYAN SANTOS, on behalf
of themselves, FLSA Collective Plaintiffs and the
Class,

Plaintiffs,

v.

PHILIPS BRYANT PARK LLC d/b/a BRYANT
PARK HOTEL, PHIL COLUMBO and MICHAEL
STRAUSS,

Defendants.

No. 17-cv-8816

**NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER (1) CONDITIONALLY
CERTIFYING SETTLEMENT CLASS AND COLLECTIVE ACTION, (2) GRANTING
PRELIMINARY APPROVAL TO PROPOSED CLASS ACTION SETTLEMENT AND
PLAN OF ALLOCATION, (3) DIRECTING DISSEMINATION OF NOTICE AND
RELATED MATERIAL TO THE CLASS, AND (4) SETTING DATE FOR FAIRNESS
HEARING AND RELATED DATES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for and Order (1) Conditionally Certifying Settlement Class and Collective Action, (2) Granting Preliminary Approval to Proposed Class Action Settlement and Plan of Allocation, (3) Directing Dissemination of Notice and Related Material to the Class, (4) Setting Date for Fairness Hearing and Related Dates ("Motion for Preliminary Approval"), and the Declaration of C.K. Lee in Support of Plaintiff's Motion for Preliminary Approval ("Lee Declaration"), Plaintiffs respectfully request that the Court enter an Order:

- (1) granting preliminary approval of the Global Settlement Agreement ("Settlement Agreement"), Decl. of C.K. Lee ("Lee Decl.") Ex. A;
- (2) certifying the proposed class for settlement purposes;

- (3) appointing Lee Litigation Group, PLLC (“Lee Litigation Group”) (“Plaintiffs’ Counsel”) as Class Counsel;
- (4) appointing Rust Consulting as Claims Administrator;
- (5) approving the proposed Notice of Class Action Settlement, Ex. B to Settlement Agreement; and
- (6) granting such other, further, or different relief as the Court deems just and proper.

* * *

Plaintiffs have contemporaneously submitted a Proposed Order, attached as Exhibit A, for the Court’s convenience.

Dated: January 10, 2019
New York, New York

Respectfully submitted,

By: /s/ C.K. Lee
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***Attorneys for Plaintiffs, FLSA Collective Plaintiffs
and the Class***